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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Cheryl Lynn Brock

CASE NUMBER: 18-03856-EE

OBJECTION TO NOTICE OF POSTPETITION MORTGAGE FEES, EXPENSES, AND

**CHARGES** 

TO: Chapter 13 Trustee

United States Trustee

USTPRegion05.JA.ECF@usdoj.gov

AFFECTED CREDITORS:

Vanderbilt Mortgage

c/o CT Corp System

645 Lakeland E Dr#101

Maryville, TN 37802

COMES NOW the debtor and objects to the Notice of Postpetition Mortgage Fees, Expenses,

and Charges filed February 27, 2019 by Vanderbilt Mortgage and Finance, Inc., and would show

unto the Court as follows:

1. Vanderbilt Mortgage and Finance, Inc. seeks repayment for \$683.00 in Insurance

Advances with a presumed incurred date of 12/17/18.

2. The documents attached to the Notice of Postpetition Mortgage Fees seems to indicate

the policies are from 2013 - 2014.

WHEREFORE, Debtor(s) pray that the Objection be sustained, and that the amounts sought

by Vanderbilt be disallowed. Alternatively, if the amounts are for a more recent time, Debtor

requests that the proper documentation be provided to counsel below for review.

Respectfully submitted on March 11, 2019.,

Cheryl Lynn Brock

BY:/s/ Bryce C. Kunz

BRYCE C. KUNZ

RICHARD R. GRINDSTAFF, MS BAR NO. 5036 BRYCE C. KUNZ, MS BAR NO. 105185 P.O. BOX 720517 BYRAM MS 39272-0517 (601) 346-6443

## **CERTIFICATE OF SERVICE**

This is to certify that I, the undersigned attorney of record for the Debtor(s), have this date mailed, postage prepaid, by United States Mail, a true and correct copy of the above and foregoing Motion for Modification of Confirmed Plan and Notice of Motion to the Trustee, U.S. Trustee and the affected creditors at the above listed addresses or by ECF Notification System.

Chapter 13 Trustee

United States Trustee

USTPRegion05.JA.ECF@usdoj.gov

The following at their addresses listed in the schedules: Vanderbilt Mortgage, c/o CT Corp System 645 Lakeland E Dr#101,

Maryville, TN 37802

SO CERTIFIED on this, March 11, 2019.

/s/ Bryce C. Kunz BRYCE C. KUNZ